

McDONALD CARANO
 100 WEST LIBERTY STREET, TENTH FLOOR • RENO, NEVADA 89501
 PHONE 775.788.2000 • FAX 775.788.2020

Adam Hosmer-Henner (NSBN 12779)
 Jane Susskind (NSBN 15099)
 McDONALD CARANO LLP
 100 West Liberty Street, Tenth Floor
 Reno, Nevada 89501
 Telephone: (775) 788-2000
 ahosmerhenner@mcdonaldcarano.com
 jsusskind@mcdonaldcarano.com

*Attorneys for Chemetall US, Inc.,
 BASF Corporation, QualiChem Inc.,
 Miles Chemical Company, John Schneider
 and Associates Inc., Broco Products, Inc.,
 Dean Meiling, Madylon Meiling, DSM Partners,
 LLC, Chemeon Surface Technology, and
 Southern Industrial Chemicals, Inc.*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

MI-94, LLC, a Nevada limited liability
 company, also known as METALAST
 INTERNATIONAL LLC,

Plaintiff

v.

CHEMETALL US, INC., a Delaware
 corporation; BASF CORPORATION, a
 Delaware corporation; QUALICHEM INC., a
 Virginia corporation; DUBOIS
 CHEMICALS, INC., a Delaware corporation;
 MILES CHEMICAL COMPANY, a
 California corporation; JOHN SCHNEIDER
 AND ASSOCIATES, INC., a Wisconsin
 corporation; BROCO PRODUCTS, INC., an
 Ohio corporation; RONATEC C2C, a
 California corporation; ELECTROPLATING
 CONSULTANTS INTERNATIONAL, an
 Oklahoma corporation; ALBEMARLE
 CORPORATION, a Nevada corporation;
 SOUTHERN INDUSTRIAL CHEMICALS,
 INC, an Alabama corporation; Dean Meiling,
 and individual, Madylon Meiling, an
 individual; DSM Partners, LLC, a Nevada
 entity; CHEMEON SURFACE
 TECHNOLOGY, a Nevada entity; and DOES
 1-10, inclusive,

Defendants

Case No. 2:23-cv-00647-CDS-DJA

**STIPULATION AND ORDER TO
 DISMISS WITH PREJUDICE**

Defendants Dean Meiling, Madylon Meiling, DSM Partners, LLC, and Chemeon Surface Technology (collectively “Meiling Defendants”), Defendant Albemarle Corporation (“Albemarle”), and Defendants Chemetall US, Inc., BASF Corporation, Qualichem Inc., Miles Chemical Company, John Schneider and Associates, Inc., Broco Products, Inc., and Southern Industrial Chemicals, Inc. (“Distributor Defendants,” and collectively with the Meiling Defendants and Albemarle, “Defendants”), and Plaintiff MI-94, LLC (“Plaintiff”) by and through their counsel of record, stipulate and agree under Fed. R. Civ. P. 41(a) to dismiss this case in its entirety with prejudice, including all claims asserted by Plaintiff in this action against any party.

The parties further stipulate and agree that each party shall bear its own attorney fees and costs incurred in this action. This stipulation and agreement does not affect any preexisting rights of any of the Defendants to indemnification from any of the other Defendants or affect any other preexisting contractual arrangements as to the responsibility of any of the Defendants to any of the other Defendants for attorney fees and costs that were incurred in this action.

Dated: October 21, 2024

**EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP**

By /s/ Jeremy J. F. Gray
Eric P. Early (Admitted pro hac vice)
Jeremy J. F. Gray (Admitted pro hac vice)
6420 Wilshire Boulevard, 17th Floor
Los Angeles, California 90048
eearly@earlysullivan.com
jgray@earlysullivan.com

and

Scott E. Gizer (NSBN 12216)
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148
sgizer@earlysullivan.com

*Attorneys for Plaintiff MI-94, LLC,
also known as METALAST
INTERNATIONAL LLC*

Dated: October 21, 2024

MCDONALD CARANO LLP

By /s/ Adam Hosmer-Henner
Adam Hosmer-Henner, NSBN 12779
Jane Susskind, NSBN 15099
100 W. Liberty Street, Tenth Floor
Reno, NV 89501

*Attorneys for Chemetall US, Inc.,
BASF Corporation, Qualichem Inc.,
Miles Chemical Company, John Schneider
and Associates Inc., Broco Products, Inc.,
Southern Industrial Chemicals, Inc., Dean
Meiling, Madylon Meiling, DSM Partners,
LLC, and Chemeon Surface Technology*

Dated: October 21, 2024

PARSONS, BEHLE & LATIMER

By /s/ R. Andrew Patty II

Rew R. Goodenow (NSBN 3722)
50 West Liberty Street, Suite 750
Reno, Nevada 89501
rgoodenow@parsonsbhle.com

and

PHELPS DUNBAR LLP

R. Andrew Patty II (Admitted pro hac vice)
Lindsay Calhoun (Admitted pro hac vice)
400 Convention St., Suite 1100
Baton Rouge, Louisiana 70802
drew.patty@phelps.com
lindsay.calhoun@phelps.com

*Attorneys for Defendant Albemarle
Corporation*

ORDER

Based on the parties' stipulation, this case is dismissed with prejudice, with each party to bear its own costs and fees. The Clerk of Court is kindly instructed to close this case.


Cristina D. Silva
United States District Judge

Dated: October 22, 2024